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ELECTRONICALLY FILED
BY HAND AND BY EMAIL

June 20, 2007

The Honorable Vincent J. Poppiti
Blank Rome LLP
1201 Market Street, Suite 800
Wilmington, DE 19801

Re: **LG.Philips LCD Co., Ltd. v. ViewSonic, C.A. No. 04-343 JJF**

Dear Special Master Poppiti:

Plaintiff LG.Philips LCD Co., Ltd. ("LPL") submits this letter concerning any impact on discovery resulting from Your Honor's recent Opinion and Order on Claim Construction.

LPL believes that supplementation likely will be unnecessary or minimal based on Your Honor's June 15, 2007 claim construction opinion. LPL is informed, however, that ViewSonic intends to seek unspecified technical discovery from LPL. To the extent that ViewSonic contends that information concerning modules is relevant, LPL notes that such information would presumably be relevant with respect to modules used in Defendants' products. Thus, while further discovery concerning LCD modules is likely not necessary, discovery should be mutual such that any discovery would apply to all parties.

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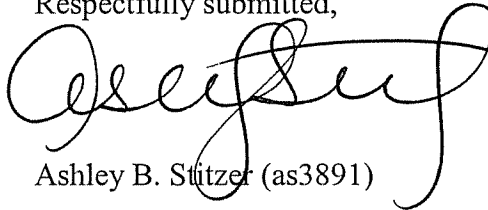
The Honorable Vincent J. Poppiti

June 20, 2007

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We will be able to better address this issue after ViewSonic identifies more specifically any additional discovery sought as a result of Your Honor's claim constructions.¹

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ashley B. Stitzer". The signature is fluid and cursive, with a large, sweeping "A" and "S".

Ashley B. Stitzer (as3891)

cc: Counsel as shown on the attached certificate

¹ LPL believes that any submission from ViewSonic without prior discussion is inconsistent with Local Rule 7.1.1. Before the June 15 opinion on claim construction was issued, during discussions concerning other discovery issues, ViewSonic's counsel confirmed that ViewSonic would likely seek some additional technical discovery from LPL regardless of the specific claim constructions adopted in this case. LPL's counsel thus requested an opportunity to meet and confer regarding what specific discovery ViewSonic might seek based on the claim constructions so that LPL could attempt to resolve any disputed issues and discuss the mutuality of any such discovery. *See, e.g.*, 6/12/07 & 6/14/07 emails from LPL's counsel (Ex. A). ViewSonic has not yet identified or agreed to discuss discovery issues in light of Your Honor's claim constructions. *See* 6/14/07 emails from ViewSonic's counsel (Ex. A).

EXHIBIT A

Christenson, Cass

From: Scott Miller [SMiller@cblh.com]
Sent: Thursday, June 14, 2007 7:59 PM
To: Christenson, Cass; Manuel C. Nelson
Cc: troman@raskinpeter.com; Jill J. Herr; Jeff Bove; James Heisman; Jaclyn M. Mason; Julie Lorenzen; Kristen Rohrabough; Litigation Docketing Desk; astitzer@bayardfirm.com; JansenA@gtlaw.com; gaza@rlf.com; DarrowC@GTLAW.com; Connor, Cormac; rkirk@bayardfirm.com; MeridethF@GTLAW.com; cottrell@rlf.com; Bono, Gaspare; HassidS@gtlaw.com; lees@rlf.com; Brzezynski, Lora; KrietzmanM@GTLAW.com; SecondoM@gtlaw.com; OhC@gtlaw.com; PouratianD@gtlaw.com; Ambrozy, Rel; Nancy Phillips
Subject: RE: LG.Philips LCD Co., Ltd. v. Tatung Co., et al., C.A. No. 04-343 (JJF)

Cass:

I think ViewSonic's positions on these issues is clearly articulated in the existing papers and hearing transcripts. Of course, should our position on discovery change based on the claim construction, we will let you know.

ViewSonic is all for a compromise that will relieve the Special Master of the need to decide issues. We have no interest in wasting time reviewing the issues solely to review them. If you have a specific proposal to produce some or all of the discovery that has been postponed and is the subject of various motions and proceedings, we are happy to hear it. To date you have offered nothing. We do not need another call the hear a repeat of that offer.

If you have a proposal to make, please do so in writing at the earliest time possible.

Scott

Scott R. Miller
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Fax: 213-687-0498
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smiller@cblh.com

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-----Original Message-----

From: Christenson, Cass [mailto:cchristenson@mckennalong.com]
Sent: Thursday, June 14, 2007 12:50 PM
To: Scott Miller; Manuel C. Nelson
Cc: troman@raskinpeter.com; Jill J. Herr; Jeff Bove; James Heisman; Jaclyn M. Mason; Julie Lorenzen; Kristen Rohrabough; Litigation Docketing Desk; astitzer@bayardfirm.com; JansenA@gtlaw.com; gaza@rlf.com; DarrowC@GTLAW.com; Connor, Cormac; rkirk@bayardfirm.com; MeridethF@GTLAW.com; cottrell@rlf.com; Bono, Gaspare; HassidS@gtlaw.com; lees@rlf.com; Brzezynski, Lora; KrietzmanM@GTLAW.com; SecondoM@gtlaw.com; OhC@gtlaw.com; PouratianD@gtlaw.com; Ambrozy, Rel; Nancy Phillips
Subject: RE: LG.Philips LCD Co., Ltd. v. Tatung Co., et al., C.A. No. 04-343 (JJF)

Scott: As I previously discussed with Manuel, my request for a call is to discuss in advance any issues that ViewSonic may intend to raise in a submission next week. As you know, there is a process in place for the parties to review the claim construction decision and then, based on that decision, to submit positions to the Special Master concerning what discovery is appropriate in light of the claim constructions. Manuel confirmed that ViewSonic indeed intends to renew its requests for certain technical

discovery following the claim construction decision, regardless of the decision. Therefore, before ViewSonic makes its submission, we should discuss the issues to understand what ViewSonic believes should be produced based on the claim constructions. Of course, we will also consider and discuss with LPL to what extent further discovery should be provided. Because the opening submissions are due three business days after the claim construction, talking on Monday would be a good first step. Are you willing to talk? Cass

-----Original Message-----

From: Scott Miller [mailto:SMiller@cblh.com]
Sent: Thursday, June 14, 2007 2:47 PM
To: Christenson, Cass; Manuel C. Nelson
Cc: troman@raskinpeter.com; Jill J. Herr; Jeff Bove; James Heisman; Jaclyn M. Mason; Julie Lorenzen; Kristen Rohrabach; Litigation Docketing Desk; astitzer@bayardfirm.com; JansenA@gtlaw.com; gaza@rlf.com; DarrowC@GTLAW.com; Connor, Cormac; rkirk@bayardfirm.com; MeridethF@GTLAW.com; cottrell@rlf.com; Bono, Gaspare; HassidS@gtlaw.com; lees@rlf.com; Brzezynski, Lora; KrietzmanM@GTLAW.com; SecondoM@gtlaw.com; OhC@gtlaw.com; PouratianD@gtlaw.com; Ambrozy, Rel; Nancy Phillips
Subject: RE: LG.Philips LCD Co., Ltd. v. Tatung Co., et al., C.A. No. 04-343 (JJF)

Cass:

ViewSonic's position of what it seeks is clearly spelled out in the various motions. We contend that substantial technical discovery must be provided regardless of the construction adopted by the Court. If LPL is willing to provide us with a written proposal on or before Monday of what it proposes to produce, we are happy to consider it and discuss it with you on Tuesday. In the absence of a proposal from LPL to produce anything, we believe that a further call will simply be a waste of time.

I look forward to receipt of your proposal should you choose to make one. Otherwise, we intend to proceed as previously discussed and agreed.

Scott

Scott R. Miller
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Fax: 213-687-0498
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-----Original Message-----

From: Christenson, Cass [mailto:cchristenson@mckennalong.com]
Sent: Thursday, June 14, 2007 7:34 AM
To: Scott Miller; Manuel C. Nelson
Cc: troman@raskinpeter.com; Jill J. Herr; Jeff Bove; James Heisman; Jaclyn M. Mason; Julie Lorenzen; Kristen Rohrabach; Litigation Docketing Desk; astitzer@bayardfirm.com; JansenA@gtlaw.com; gaza@rlf.com; DarrowC@GTLAW.com; Connor, Cormac; rkirk@bayardfirm.com; MeridethF@GTLAW.com; cottrell@rlf.com; Bono, Gaspare; HassidS@gtlaw.com; lees@rlf.com; Brzezynski, Lora; KrietzmanM@GTLAW.com; SecondoM@gtlaw.com; OhC@gtlaw.com; PouratianD@gtlaw.com; Ambrozy, Rel
Subject: FW: LG.Philips LCD Co., Ltd. v. Tatung Co., et al., C.A. No. 04-343 (JJF)

I did not receive any response to my June 12 email. I propose that we talk on Monday at 2:00 p.m. (Washington time). Below are the call in numbers to use. I look forward to speaking with you soon. Cass

1-866-244-8528 = toll free number

404531 = Participant code

From: Christenson, Cass
 Sent: Tuesday, June 12, 2007 6:28 PM
 To: MNelson@cblh.com; SMiller@cblh.com; 'HoV@GTLAW.com'
 Cc: 'SMiller@cblh.com'; 'troman@raskinpeter.com'; 'JHerr@cblh.com'; 'JBove@cblh.com'; 'JHeisman@cblh.com'; 'JMason@cblh.com'; 'JLorenzen@cblh.com'; 'KRohrbaugh@cblh.com'; 'dkt@cblh.com'; 'NPhillips@cblh.com'; 'MNelson@cblh.com'; 'astitzer@bayardfirm.com'; 'JansenA@gtlaw.com'; 'gaza@rlf.com'; 'DarrowC@GTLAW.com'; Connor, Cormac; 'rkirk@bayardfirm.com'; 'MeridethF@GTLAW.com'; 'cottrell@rlf.com'; Bono, Gaspare; 'HassidS@gtlaw.com'; 'lees@rlf.com'; Brzezynski, Lora; 'KrietzmanM@GTLAW.com'; 'SecondoM@gtlaw.com'; 'OhC@gtlaw.com'; 'PouratianD@gtlaw.com'; Ambrozy, Rel
 Subject: RE: LG.Philips LCD Co., Ltd. v. Tatung Co., et al., C.A. No. 04-343 (JJF)

Based on our call today, LPL understands that ViewSonic will be seeking technical discovery from LPL following the Special Master's decision on claim construction. As I explained to Manuel, I believe that it would be appropriate for us to discuss this issue further before the parties file submissions with the Special Master next week. Therefore, I propose that we speak on Monday, June 18. Please let me know what time on Monday you can talk, and I will circulate call in numbers. Tatung, of course, is invited. Cass

From: Christenson, Cass
 Sent: Tuesday, June 12, 2007 3:02 PM
 To: 'HoV@GTLAW.com'
 Cc: SMiller@cblh.com; troman@raskinpeter.com; JHerr@cblh.com; JBove@cblh.com; JHeisman@cblh.com; JMason@cblh.com; JLorenzen@cblh.com; KRohrbaugh@cblh.com; dkt@cblh.com; NPhillips@cblh.com; MNelson@cblh.com; astitzer@bayardfirm.com; JansenA@gtlaw.com; gaza@rlf.com; DarrowC@GTLAW.com; Connor, Cormac; rkirk@bayardfirm.com; MeridethF@GTLAW.com; cottrell@rlf.com; Bono, Gaspare; HassidS@gtlaw.com; lees@rlf.com; Brzezynski, Lora; KrietzmanM@GTLAW.com; SecondoM@gtlaw.com; OhC@gtlaw.com; PouratianD@gtlaw.com; Ambrozy, Rel
 Subject: RE: LG.Philips LCD Co., Ltd. v. Tatung Co., et al., C.A. No. 04-343 (JJF) -- June 12, 2007 Letter

Please use the below call in numbers. Cass

1-866-244-8528 = toll free number

404531 = Participant code

From: HoV@GTLAW.com [mailto:HoV@GTLAW.com]
 Sent: Tuesday, June 12, 2007 3:00 PM
 To: Christenson, Cass
 Cc: SMiller@cblh.com; troman@raskinpeter.com; JHerr@cblh.com; JBove@cblh.com; JHeisman@cblh.com; JMason@cblh.com; JLorenzen@cblh.com; KRohrbaugh@cblh.com; dkt@cblh.com; NPhillips@cblh.com; MNelson@cblh.com; astitzer@bayardfirm.com; JansenA@gtlaw.com; gaza@rlf.com; DarrowC@GTLAW.com; Connor, Cormac; rkirk@bayardfirm.com; MeridethF@GTLAW.com; cottrell@rlf.com; Bono, Gaspare; HassidS@gtlaw.com; lees@rlf.com; Brzezynski, Lora; KrietzmanM@GTLAW.com; SecondoM@gtlaw.com; OhC@gtlaw.com; PouratianD@gtlaw.com; Ambrozy, Rel
 Subject: RE: LG.Philips LCD Co., Ltd. v. Tatung Co., et al., C.A. No. 04-343 (JJF) -- June 12, 2007 Letter

I am available. Please send dial-in information. Thanks.

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From: Christenson, Cass [<mailto:cchristenson@mckennalong.com>]
 Sent: Tuesday, June 12, 2007 10:36 AM
 To: Ho, Valerie W. (Shld-LA-LT)
 Cc: SMiller@cblh.com; troman@raskinpeter.com; JHerr@cblh.com; JBove@cblh.com; JHeisman@cblh.com; JMason@cblh.com; JLorenzen@cblh.com; KRohrbaugh@cblh.com; dkt@cblh.com; NPhillips@cblh.com; MNelson@cblh.com; astitzer@bayardfirm.com; Jansen, Allan W. (Shld-OC-IP); gaza@rlf.com; Darrow, Christopher (Shld-LA-IP); Connor, Cormac; rkirk@bayardfirm.com; Merideth, Frank (Shld-LA-LT); cottrell@rlf.com; Bono, Gaspare; Hassid, Steve (Assoc-LA-IP); lees@rlf.com; Brzezynski, Lora; Krietzman, Mark H. (Shld-LA-IP); Secondo, Michael (Para-LA-LT); Oh, Charlene L. (Assoc-LA-LT); Pouratian, Debbie (Assoc-LA-LT); Ambrozy, Rel
 Subject: LG.Philips LCD Co., Ltd. v. Tatung Co., et al., C.A. No. 04-343 (JJF) -- June 12, 2007 Letter

Valerie: Please see my attached June 12, 2007 letter. Manuel and I are scheduled to talk today at 4:30 (Washington time) if you are available.
 Regards, Cass

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CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on June 20, 2007, she electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

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James D. Heisman, Esq.
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Frederick L. Cottrell, III, Esq.
Anne Shea Gaza, Esq.
Richards, Layton & Finger
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P.O. Box 551
Wilmington, DE 19899

The undersigned counsel further certifies that copies of the foregoing document were sent by email and by hand on June 20, 2007 to the above counsel and were sent by email and by U.S. Mail on June 20, 2007 to the following non-registered participants:

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Los Angeles, CA 90067

/s/ Ashley B. Stitzer (as3891)
Ashley B. Stitzer